

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESALE PRICE  
LITIGATION

MDL 1456

Master File No. 01-CV-12257-PBS

Judge Patti B. Saris

**THIS DOCUMENT RELATES TO:**

*Turner v. Abbott Laboratories, Inc., et al.*  
N.D. Cal. Case No. C 02-5006 MJJ

*Rice v. Abbott Laboratories, et al.,* N.D.  
Cal. Case No. C 02-3925 MJJ

*Thompson v. Abbott Laboratories, et al.*  
N.D. Cal. Case No. C 02-4450 MJJ

**PLAINTIFF RONALD E. TURNER'S JOINDER IN PLAINTIFFS RICE AND  
THOMSONS' MEMORANDUM OF LAW IN SUPPORT OF JOINT  
OPPOSITION TO MOTION TO COMPEL JURISDICTIONAL DISCOVERY**

Pursuant to Local Rule 7.1, Plaintiff Ronald E. Turner ("Turner") respectfully joins in the joint Opposition, filed by Plaintiffs John Rice ("Rice") and Constance Thompson ("Thompson") in closely related actions C 02-3925 MJJ and C 02-4450 MJJ in Opposition to the Motion to Compel Jurisdictional Discovery filed by various Defendants which Defendants filed in the Rice and Thompson actions.

In support of this Joinder, rather than burden the parties and the court with duplicative papers, Turner respectfully incorporates, as if fully set forth herein, the papers, evidence and arguments filed in support of the Opposition to Motion to Compel Discovery of Plaintiffs Rice and Thompson, including their Memorandum of Law, and such other memoranda as may be filed.

Respectfully Submitted,

DATED: October 2, 2003

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By:

A handwritten signature in dark ink, appearing to read "Derek G. Howard", is written over a horizontal line.

Derek G. Howard, Esq.

*Attorneys for Plaintiff, on behalf of  
himself, and all others similarly  
situated, and the general public.*